

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262
THIS DOCUMENT RELATES TO:	Master File No. 1:11-md-2262-NRB ECF Case
The OTC Action	

**OTC PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT WITH BARCLAYS BANK PLC**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on a date and at a time to be determined by the Court, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, OTC Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (i) granting preliminary approval of the proposed settlement ("Settlement") reached between OTC Plaintiffs and defendant Barclays Bank, plc ("Barclays") in the above-captioned action; (ii) certifying the putative Class for settlement purposes; (iii) appointing Hausfeld LLP and Susman Godfrey LLP as Settlement Class Counsel; and (iv) approving OTC Plaintiffs' choice of a Settlement Administrator, Claims Administrator, and Escrow Agent.

Submitted herewith in support of OTC Plaintiffs' Motion for Preliminary Approval of Settlement with Barclays are: (i) the Memorandum of Law in Support of OTC Plaintiffs' Motion for Preliminary Approval of Settlement with Barclays Bank PLC; (ii) the Declaration of Michael

D. Hausfeld in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Barclays Bank PLC and the Exhibits thereto; and (iii) the [Proposed] Order Preliminarily Approving Settlement.

March 8, 2016

Respectfully submitted,

/s/ William C. Carmody

William C. Carmody
Arun Subramanian
Seth Ard
SUSMAN GODFREY L.L.P.
560 Lexington Avenue, 15th Floor
New York, NY 10022
Tel: 212-336-8334
bcarmody@susmangodfrey.com
asubramanian@susmangodfrey.com
sard@susmangodfrey.com

Marc M. Seltzer
SUSMAN GODFREY L.L.P.
1901 Avenue of the Stars, Suite 950
Los Angeles, CA 90067
Tel: 310-789-3100
mseltzer@susmangodfrey.com

/s/ Michael D. Hausfeld

Michael D. Hausfeld
William P. Butterfield
Hilary K. Scherrer
Nathaniel C. Giddings
HAUSFELD LLP
1700 K Street, NW, Suite 650
Washington, DC 20006
Tel: 202-540-7200
mhausfeld@hausfeld.com
wbutterfield@hausfeld.com
hscherrer@hausfeld.com
ngiddings@hausfeld.com

Counsel for the OTC Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Hilary K. Scherrer

Hilary K. Scherrer